

June 26, 2015

Dear Julia Saare-Edmonds:

As a professional Landscape Architect in the City of Los Angeles, I would like to thank you for this opportunity to comment on the latest draft of the Model Water Efficient Landscape Ordinance Update dated 6/12/15.

I am keenly aware of the crisis that the ongoing drought has brought to our state, and appreciate the huge effort that has gone into the draft MWELU update. There are many forward-thinking revisions included that will make long standing, positive change towards our landscapes becoming more sustainable in this changing climate. However, there are issues which I believe require further review and comment from professional stakeholder groups such as the American Society of Landscape Architects (ASLA), the American Society of Irrigation Consultants, Nursery Growers Association of California (NGA), and the California Association of Nurseries and Gardens (CANGC).

One issue with the draft MWELU concerns the proposed reduction to the Maximum Applied Water Allowance (MAWA). Even with the most efficient irrigation systems currently on the market, our planting palette in Los Angeles will be generally restricted to low water use plants as a result of this change. While we have spent many years moving in this direction and we agree that this is the way of the future, the landscape industries and market are not yet equipped to meet the challenges inherent in immediate changes of this magnitude. The Nursery industry will take time to get up to speed with the supply quantity of low water use and native plant material to accommodate this change. We already have a difficult time filling orders for low water, drought-adapted and native plants!

The Irrigation industry will also need to continue to develop significantly more efficient equipment to allow for design flexibility. These mandates will require the use of low precipitation irrigation products that eliminate over half of the current products on the market. According to the letter of the draft MWELU, even some drip applications and tree bubblers will not be allowed. While turf in parks and sports fields will still be allowed, the precipitation rates of the heads most appropriate for these landscapes will not be allowed. The suggested efficiency ratings the MWELU would require are far higher than anything that design professionals have available.

Additionally, the draft MWELU would restrict our ability to deliver holistic, environmentally-beneficial designs for our diverse California landscapes. If these and other related industries cannot meet the demand, we may be in for more sterile zeroscape/ xeriscape gravel gardens that do not reflect the Mediterranean climate vegetation endemic to Southern California. Gravel doesn't attract birds, create habitat, or provide respite from urban heat island effect.

We all agree that we should continue to reduce our water usage in the landscape, but as Landscape Architects we should be allowed to achieve projects without limiting design restrictions by the state. The State should set a reasonable water use goal and allow flexibility for us to design to that result.

We implore the DWR to sit down again with the professional associations and trades and explore what can realistically be done. A phased game plan that allows for education of the public and the growth of the landscape industry supply will be needed to allow us to deliver positive change during this crucial transitional time.

Sincerely,

**Brent Jacobsen**

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